

### REMARKS

This application has been reviewed in light of the Office Action dated March 15, 2004. Claims 1-33 are pending in this application. Claims 1, 11, 12, 23, and 33 have been amended. Claims 1, 11, 12, 22, 23, and 33 are in independent form. Favorable reconsideration is requested.

The Examiner objected to the drawings as to matters related to form. Applicants enclose herein corrected formal drawings and respectfully request that the objection to the drawings be withdrawn.

The Office Action has rejected Claims 1-6, 8-17, 19, 21-28, and 30-33 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,546,529 (Bowers), and rejected Claims 7, 18, 20, and 29 under 35 U.S.C. § 103(a) as being obvious from Bowers in view of U.S. Patent No. 6,470,344 B1 (Kothuri).

It is submitted that independent Claims 1, 11, 12, 21, 22, and 33, together with the remaining claims dependent thereon, are patentably distinct from Bowers at least for the following reasons.

One aspect of the present invention, as set forth in Claim 1, is a method for creating a tree having a plurality of nodes and a plurality of objects associated therewith, where each object has a plurality of attributes. The method includes the steps of selecting, by a user, the attributes in accordance with the user's preferences, creating the tree in accordance with the selected attributes, and automatically updating the tree based on changes to the objects or the attributes. Support in the specification for the latter feature can be found at least at page 4, lines 12-16; page 6, lines 2-6; page 7, lines 25-29; and page 13, lines 15-21. (It is to be understood, of course, that the scope of Claim 1 is not limited to the details of these embodiments.) With this feature, the tree can be automatically updated to represent the complete contents of a dynamic database, for example, when

objects are being added or removed, and when the attributes of the objects are dynamically changing.

Bowers relates to a method and apparatus for using a three-dimensional tree structure to represent the results of a database search. The Office Action states that Bowers at col. 7, line 18, to col. 8, line 35, discloses “selecting, by the user, the attributes in accordance with the user’s preference” and “creating the tree in accordance with the selected attributes.” However, nothing has been found in this section, or any other section, of Bowers that teaches or suggests automatically updating the tree based on changes to the objects or the attributes, as recited in amended Claim 1.

Accordingly, it is submitted that at least for this reason, amended Claim 1 is patentable over Bowers, and withdrawal of this rejection is hereby requested.

Independent Claims 12 and 23, as amended, are system and storage medium claims, respectively, that correspond to Claim 1, and are believed to be patentable for at least the same reasons as discussed above.

Another aspect of the present invention, as set forth in amended Claim 11, is a method for displaying a plurality of objects of a tree having a plurality of nodes. The method includes the steps of associating the plurality of objects with the node, each object having a plurality of attributes, wherein the objects associated with any one of the nodes is a superset of objects associated with lower nodes, and applying a filter to each lower node in successive fashion so that only those objects contained in a higher node that have an attribute matching the node attribute are displayed.

Bowers, as discussed above, relates to a method and apparatus for using a three-dimensional tree structure to represent the results of a database search. The Office Action states that Bowers at col. 7, line 18, to col. 8, line 35, discloses the associating and applying steps as recited in Claim 11. Applicants respectfully traverse, as follows. Applicants understand Bowers as merely disclosing creating and viewing a tree structure.

However, nothing has been found in Bowers that would teach or suggest applying a filter to each lower node in successive fashion so that only those objects contained in a higher node that have an attribute matching the node attribute are displayed, as recited in amended Claim 11.

Specifically, Bowers creates and displays a tree structure view based on search results and user-specified preference (e.g., col.8, lines 14-16). Once that tree structure has been displayed, no filtering of any kind is performed thereon. In fact, only three post-display operations are disclosed; highlighting a document path, viewing a document, or causing a document to be retrieved from a database (e.g., col. 8, lines 18-20). None of those operations call for the filtering specified in Claim 11 of the present application.

Accordingly, it is submitted that at least for this reason, amended Claim 11 is patentable over Bowers, and withdrawal of this rejection is hereby requested.

Independent Claims 22 and 33 are system and storage medium claims, respectively, that correspond to Claim 11, and are believed to be patentable for at least the same reasons as discussed above.

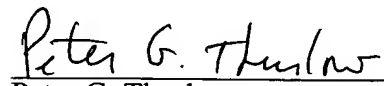
A review of the other art of record, including Kothuri, has failed to reveal anything that would remedy the deficiencies of the art discussed above, as applied against the independent claims herein. Therefore, those claims are respectfully submitted to be patentable over the art of record.

The other rejected claims in this application depend from one or another of the independent claims discussed above, and, therefore, are submitted to be patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, favorable reconsideration and early passage to issue of the present application is respectfully requested.

The undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

  
Peter G. Thurlow

Registration No. 47,138

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2200

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